

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN RE:

Michael T. McLaughlin,

DEBTOR.

CHAPTER 13
CASE NO. 19-40180-MBM
JUDGE MARCI B. MCIVOR

TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN

NOW COMES the Chapter 13 Standing Trustee, David Wm. Ruskin, and objects to confirmation of the Chapter 13 Plan in the above matter pursuant to L.B.R. 3015-3(a) (E.D.M.) as follows:

1. The debtor has failed to provide copies of the debtor's 2016, 2017, and 2018 Federal Income Tax returns prior to the First Meeting of Creditors as required by 11 U.S.C. Section 521(e)(1)(2)(A). The Trustee therefore requests that the debtor produce the debtor's 2016, 2017, and 2018 income tax returns no later than 14 days prior to the scheduled Confirmation Hearing in order for the Trustee to determine whether the debtor's Plan complies with 11 U.S.C. Section 1325(b), 11 U.S.C. Section 1325(a)(3) and 11 U.S.C. Section 1325(a)(6).

2. Based upon the Judgment of Divorce provided by the debtor to the Trustee, the debtor may have an interest in a Ford Flex motor vehicle although the vehicle or disposition of the vehicle is not disclosed in Schedule A/B or in the Statement of Financial Affairs. Accordingly, absent further information, the Trustee is unable to determine if the debtor's Plan complies with 11 U.S.C Section 1325.

3. Based upon the debtor's testimony at the First Meeting of Creditors, the debtor is seeking new employment. The Trustee therefore requests upon securing new employment, the debtor amend Schedule I and provide proof of the debtor's current sources of income so the Trustee can determine whether the debtor's Plan complies with 11 U.S.C. Section 1325.

WHEREFORE, the Chapter 13 Standing Trustee requests this Honorable Court deny confirmation of the debtor's Chapter 13 Plan unless modified to meet these objections.

OFFICE OF DAVID WM. RUSKIN,
STANDING CHAPTER 13 TRUSTEE

Dated: March 4, 2019

By: /s/ Lisa K. Mullen
LISA K. MULLEN (P55478)
THOMAS D. DECARLO (P65330)
Attorneys for Chapter 13 Trustee,
David Wm. Ruskin
1100 Travelers Tower
26555 Evergreen Road
Southfield, MI 48076-4251
Telephone (248) 352-7755

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN RE:

Michael T. McLaughlin,

DEBTOR.

CHAPTER 13

CASE NO. 19-40180-MBM

JUDGE MARCI B. MCIVOR

**CERTIFICATE OF SERVICE OF TRUSTEE'S OBJECTIONS TO
CONFIRMATION OF CHAPTER 13 PLAN**

I hereby certify that on March 4, 2019, I electronically filed the Trustee's Objections to Confirmation of Chapter 13 Plan with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

The following parties were served electronically:

ACCLAIM LEGAL SERVICES PLLC
8900 E 13 MILE RD
WARREN, MI 48093-0000

The following parties were served via First Class Mail at the addresses below by depositing same in a United States Postal Box with the lawful amount of postage affixed thereto:

Michael T. McLaughlin
256 South Chocoday
Clawson, MI 48017-0000

/s/ Vanessa Wild

Vanessa Wild
For the Office of David Wm. Ruskin
Chapter 13 Standing Trustee - Detroit
1100 Travelers Tower
26555 Evergreen Road
Southfield, MI 48076-4251
(248) 352-7755